



NHTSA-03-15651-36

PO Box 13090 Research Triangle Park, NC 27709-5065 ☐ Fax: 919 440 4800 • Fax: 919 549 4624 ☐ www.nhtsa.gov

Primary Members:

Automotive Lighting Corp.
Decoma International Corp.
Guide Corp.
Hella Lighting Corp.
Il Stanley Co. Inc.
North American Lighting Inc.
Valeo Sylvania
Visteon Corp.

National Highway Traffic Safety Administration
Docket Management Facility
Room PL-401
400 Seventh Street, SW
Washington, DC 20590-001

10.31.2003

RECEIVED
NHTSA
OCT 31 2003

Re: Motor Vehicle Lighting Council Comments on NHTSA Request for Comments; Notice Docket No. NHTSA-03-15651, Interpretation of Federal Motor Vehicle Safety Standard No. 108 on Lamps, Reflective Devices, and Associated Equipment applies to replacement equipment.

Affiliate Members:

Denso Corp.
GE Lighting
OSRAM Sylvania
Philips Lighting
Rensselaer Polytechnic Institute
Transportation Lighting Alliance
University of Michigan
Transportation Research
Institute (UMTRI)

Dear Sir or Madam:

The Motor Vehicle Lighting Council (MVLIC) hereby submits comments on the above-identified Notice; Request for Comments.

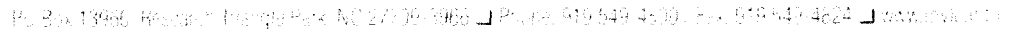
MVLIC supports NHTSA's concern that continued efforts to make improvements in highway safety are being impaired by the performance and design of some lighting devices being sold by certain manufacturers.

Generally, a lamp which is designed to conform and performs to the relevant requirements of FMVSS No. 108 should be regarded as legal. Incorporating new technologies and/or improved appearance or functional designs into replacement lamps should be allowed only if the vehicle complies with FMVSS 108 after the replacement lighting equipment is installed.


In Summary, any lamp or lamps that are being installed on a motor vehicle in addition to the original equipment or to replace or enhance the original equipment (retrofit/conversion):

- Must include, at minimum, all the same lighting functions that the original equipment manufacturer's (OEM) had installed on the vehicle.
- Must meet all applicable photometric and environmental requirements of FMVSS 108.
- Retrofit / Conversion lamps that are different from the original equipment lamps must replace the existing lamps in pairs such that there is a symmetrical appearance.
- It is not necessary to use the exact same OEM specified bulbs or light sources nor does it have to be the exact same arrangement, as long as all lighting functions are included and all dimensional and geometric visibility requirements are satisfied for the vehicle.





Thank you for your thoughtful consideration of these comments.



Joe Borruso
Chairman - MVLC

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